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FILED
DISTRICT COURT OF GUAM

JAN 23 2008

JEANNE G. QUINATA
Clerk of Court

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DEUK SOON CHOI,

Defendant.

CRIMINAL CASE NO. 08-00003

INDICTMENT

CRIMINAL CONSPIRACY

[18 U.S.C. §§ 2 & 371]

FRAUD IN CONNECTION WITH
IDENTIFICATION DOCUMENTS[18 U.S.C. §§ 2 & 1028(a)(1); 1028(b)(1)(A)(ii)
& 1028(c)(3)(A)]

THE GRAND JURY CHARGES:

COUNT I - CRIMINAL CONSPIRACY

On or about March 25, 2004, within the District of Guam, the defendant herein, DEUK SOON CHOI, did willfully and knowingly combine, conspire, confederate and agree with Eun Young Lee and others, both known and unknown to the Grand Jury, to commit the offense of Fraud in Connection with Identification Documents, in violation of Title 18, United States Code, Section 1028(a)(1), and to aid, abet, counsel, command, induce and procure the conspiracy charged in this count and willfully cause others to perform acts and make statements in furtherance of the conspiracy, and did perform at least an overt act for the purpose of carrying out

1 the conspiracy, to-wit: the submission of an application for a Guam driver's license, said
2 application bearing a false Taxpayer Identification Number (TIN) 943-79-1970

3 ALL IN VIOLATION of Title 18, United States Code, Sections 2 and 371.

4 **COUNT II - FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENT**

5 On or about March 25, 2004, in the District of Guam, the defendant herein, DEUK
6 SOON CHOI, did knowingly and without lawful authority produce an identification document,
7 authentication feature and false identification document, to-wit: Guam driver's license number
8 1228097589, by means of a false Internal Revenue Service Taxpayer Identification Number
9 (TIN) 943-79-1970, and the production of said driver's license was in and affected interstate and
10 foreign commerce,

11 ALL IN VIOLATION of Title 18, United States Code, Sections 2, 1028(a)(1),
12 1028(b)(1)(A)(ii) and 1028(c)(3)(A).

13 DATED this 23rd day of JANUARY 2008.

14 A TRUE BILL.

15
16
17 **REDACTED**

18 LEONARDO M. RAPADAS
19 United States Attorney
20 Districts of Guam and NMI

21 By: 

22 KARON V. JOHNSON
Assistant U.S. Attorney

23 Reviewed:

24
25 By: 

26 JEFFREY J. STRAND
First Assistant U.S. Attorney

Place of Offense:

City Hagåtña

Related Case Information:

08-00003

Country/Parish _____

Superseding Indictment _____ Docket Number _____
Same Defendant _____ New Defendant x
Search Warrant Case Number _____
R 20/ R 40 from District of _____

Defendant Information:

Juvenile: Yes _____ No X Matter to be sealed: x Yes _____ No

Defendant Name DEUK SOON CHOI

Alias Name _____

Address _____

RECEIVED
JAN 23 2008

DISTRICT COURT OF GUAM
HAGATNA, GUAM

Birthdate Xx/xx/ SS# xxx-xx- Sex F Race A Nationality Korean

U.S. Attorney Information:

AUSA Karon V. Johnson

Interpreter: _____ No X Yes List language and/or dialect: Korean

Location Status:

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody

☐ On Pretrial Release

U.S.C. Citations

Total # of Counts: 1 2 _____ Petty _____ Misdemeanor X Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
Set 1	<u>18 USC 2, 371</u>	<u>Criminal Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 2, 1028(a)(1); 1028(b)(1)(A)(ii); 1028(c)(3)(A)</u>	<u>Fraud in Connection with Identification Documents</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____

(May be continued on reverse)

Date: 07/5/07 Signature of AUSA: Karon V. Johnson